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## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF PENNSYLVANIA

In re:

**CHRISTOS KOURELIAS** 

: Bankruptcy No. 16-13426JKF

Debtor(s) : Chapter 13

\* \* \* \* \* \* \*

HEARING TO BE HELD: Date: December 7, 2017

Time: 9:30 a.m.
Place: United States
Bankruptcy Court

Courtroom #3
900 Market Street

Philadelphia, PA 19107-4295

\* \* \* \* \* \* \*

## TRUSTEE'S MOTION TO DISMISS PURSUANT TO 11 U.S.C. SECTION 1307

To the Honorable Judges of the United States Bankruptcy Court for the Eastern District of Pennsylvania:

- 1. Your Movant is Frederick L. Reigle, Esq. the duly qualified and acting Chapter 13 Trustee in the above-captioned case.
- 2. The within case was commenced by the filing of a Chapter 13 petition on 5/13/16.
- 3. This Motion to Dismiss has been filed for the following reason(s):
  - The Debtor(s) has/have failed to commence or continue making timely payments to the Trustee as required by 11 U.S.C. Section 1326.
- 4. For the reasons set forth herein, the Trustee believes, and therefore avers, that the within case should be dismissed.

WHEREFORE, the Movant requests that the Court, after a hearing, enter an Order dismissing this case.

Respectfully submitted,

Date: November 15, 2017 /s/ Polly A. Langdon

Polly A. Langdon, Esq. for Frederick L. Reigle, Esq. Standing Chapter 13 Trustee 2901 St. Lawrence Avenue P. O. Box 4010 Reading, Pennsylvania 19606 Telephone: (610) 779-1313